

EXHIBIT D - 1

COMPLAINT TRANSMITTAL COVERSHEET

Attached is a Complaint that has been filed against you with the World Intellectual Property Organization (WIPO) Arbitration and Mediation Center (the Center) pursuant to the Uniform Domain Name Dispute Resolution Policy (the Policy) approved by the Internet Corporation for Assigned Names and Numbers (ICANN) on October 24, 1999, the Rules for Uniform Domain Name Dispute Resolution Policy (the Rules), and the WIPO Supplemental Rules for Uniform Domain Name Dispute Resolution Policy (the Supplemental Rules).

The Policy is incorporated by reference into your Registration Agreement with the Registrar(s) of your domain name(s), in accordance with which you are required to submit to a mandatory administrative proceeding in the event that a third party (a Complainant) submits a complaint to a dispute resolution service provider, such as the Center, concerning a domain name that you have registered. You will find the name and contact details of the Complainant, as well as the domain name(s) that is/are the subject of the Complaint in the document that accompanies this Coversheet.

You have no duty to act at this time. Once the Center has checked the Complaint to determine that it satisfies the formal requirements of the Policy, the Rules and the Supplemental Rules, it will forward an official copy of the Complaint to you. You will then have 20 calendar days within which to submit a Response to the Complaint in accordance with the Rules and Supplemental Rules to the Center and the Complainant. You may represent yourself or seek the assistance of legal counsel to represent you in the administrative proceeding.

- The Policy can be found at <http://arbiter.wipo.int/domains/rules/>
- The Rules can be found at <http://arbiter.wipo.int/domains/rules/>
- The Supplemental Rules, as well as other information concerning the resolution of domain name disputes can be found at <http://arbiter.wipo.int/domains/rules/>
- A model Response can be found at <http://arbiter.wipo.int/domains/respondent/index.html>

Alternatively, you may contact the Center to obtain any of the above documents. The Center can be contacted in Geneva, Switzerland by telephone at +41 22 338 8247, by fax at +41 22 740 3700 or by e-mail at domain.disputes@wipo.int.

You are kindly requested to contact the Center to provide the contact details to which you would like (a) the official version of the Complaint and (b) other communications in the administrative proceeding to be sent.

A copy of this Complaint has also been sent to the Registrar(s) with which the domain name(s) that is/are the subject of the Complaint is/are registered.

By submitting this Complaint to the Center the Complainant hereby agrees to abide and be bound by the provisions of the Policy, Rules and Supplemental Rules.

Before the:

**WORLD INTELLECTUAL PROPERTY ORGANIZATION
ARBITRATION AND MEDIATION CENTER**

**La Société des Bains de Mer et du
cercle des étrangers à Monaco,
Place du Casino, Monte Carlo, MC
98000 Monaco, Principauté de Monaco**

(Complainant)

-v-

**Lucan Toh and Max Wright
46 Berkeley Square
London, London W1J 5AT
United Kingdom**

(Respondents)

Disputed Domain Names:

**grandmonaco.com
casinograndmonaco.com
grandmonacocasino.com
deutschesgrandmonaco.com
grandmonacoayda.com
grandmonacoayuda.com
grandmonacobingo.com
grand-monaco.com
grand-monaco-casino.com
grand-monaco-poker.com
grandmonacocasinoclub.com
grandmonacoclub.com
grandmonacoeraps.com
grandmonacogames.com
grandmonacogaming.com
grandmonacohost.com
grandmonacohosts.com
grandmonacolottery.com
grandmonacolotto.com
grandmonacolounge.com
grandmonacomahjong.com
grandmonacomillions.com
grandmonaconews.com
grandmonaconlinecasino.com
grandmonaconlinegaming.com
grandmonaconlinepoker.com
grandmonacopartners.com
grandmonacoplayersclub.com
grandmonacopoker.com**

grandmonacopokerclub.com
grandmonacopromotions.com
grandmonacoracebook.com
grandmonacorewards.com
grandmonacoskillgames.com
grandmonacoslots.com
grandmonacosports.com
grandmonacosportsbook.com
grandmonacostore.com
grandmonacosupport.com
grandmonacovideopoker.com
grandmonaco.net
casinograndmonaco.net
grandmonacobingo.net
grandmonacocasino.net
grandmonacocasinoclub.net
grandmonacogames.net
grandmonacogaming.net
grandmonacolottery.net
grandmonacomillions.net
grandmonacoplayerclub.net
grandmonacopoker.net
grandmonacopokerclub.net
grandmonacoracebook.net
grandmonacoskillgames.net
grandmonacosports.net
grandmonacosportsbook.net
pokergrandmonaco.net
grandmonaco.org
casinograndmonaco.org
grandmonacocasino.org
grandmonacocasinoclub.org
grandmonacomillions.org
grandmonacopoker.org
grandmonacopokerclub.org
grandmonacoracebook.org
pokergrandmonaco.org

AMENDED COMPLAINT

(Rules, para. 3(b))

I. Introduction

[1.] This Complaint is hereby submitted for decision in accordance with the Uniform Domain Name Dispute Resolution Policy (the **Policy**), approved by the Internet Corporation for Assigned Names and Numbers (ICANN) on October 24, 1999, the Rules for Uniform Domain Name Dispute Resolution Policy (the **Rules**), approved by ICANN on October 24, 1999 and the WIPO Supplemental Rules for Uniform Domain Name Dispute Resolution Policy (the **Supplemental Rules**).

II. The Parties

A. The Complainant

(Rules, para. 3(b)(ii) and (iii))

[2.] The Complainant in this administrative proceeding is:

Société des Bains de Mer et du Cercle des Étrangers à Monaco, a limited liability company enrolled with the registry of companies of Monaco under number 56 S 00523, represented by its legal representatives,

As referred hereunder as the **Société des Bains de Mer** or **SBM**.

[3.] The Complainant's contact details are:

Address: Place du Casino, Monte Carlo, MC 98000 Monaco,
Principauté de Monaco.
Telephone: +377 92 16 20 00
Fax: +377 92 16 38 93

[4.] The Complainant's authorized representative in this administrative proceeding is:

Representative: De Gaulle Fleurance & Associés
Address: 11, rue Portalis
75008 Paris
France
Telephone: +33 1 56 64 00 00
Fax: +33 1 56 64 00 01
E-mail: jhorn@dgfla.com

[5.] The Complainant's preferred method of communications directed to the Complainant in this administrative proceeding is:

Electronic-only material

Method: e-mail
Address: jhorn@dgfla.com

Contact: Maître Julien Horn

Material including hardcopy

Method: post
Address: De Gaulle Fleurance & Associés
11, rue Portalis
75008 Paris
France

Contact: Maître Julien Horn

B. The Respondent

(Rules, para. 3(b)(v))

[6.] The disputed domain names are registered to **Lucan Toh or Max Wright** as shown in the Registrar's WhoIs database as shown in the printouts provided in Annex [A].

[7.] All information known to the Complainant regarding how to contact the Respondents is as follows:

Address: **Lucan Toh and Max Wright**
46, Berkeley Square
London, London W1J 5AT
United Kingdom

Telephone: +44-20- 7598- 4064

Email: calan.horsman@playshare.com

III. The Domain Names and Registrar

(Rules, para. 3(b)(vi) and (vii))

[8.] This dispute concerns the domain names identified below:

GRANDMONACO.COM
CASINOGRANDMONACO.COM
GRANDMONACOCASINO.COM
DEUTSCHESGRANDMONACO.COM
GRANDMONACOAYDA.COM
GRANDMONACOAYUDA.COM
GRANDMONACOBINGO.COM
GRAND-MONACO.COM
GRAND-MONACO-CASINO.COM
GRAND-MONACO-POKER.COM
GRANDMONACOCASINOCUB.COM
GRANDMONACOCUB.COM
GRANDMONACOCRAPS.COM
GRANDMONACOGAMES.COM
GRANDMONACOGAMING.COM
GRANDMONACOHOST.COM
GRANDMONACOHOSTS.COM
GRANDMONACOLOTTERY.COM
GRANDMONACOLOTTO.COM
GRANDMONACOLOUNGE.COM
GRANDMONACOMAHJONG.COM
GRANDMONACOMILLIONS.COM
GRANDMONACONEWS.COM
GRANDMONACOONLINECASINO.COM
GRANDMONACOONLINEGAMING.COM
GRANDMONACOONLINEPOKER.COM
GRANDMONACOPARTNERS.COM
GRANDMONACOPLAYERSCLUB.COM
GRANDMONACOPOKER.COM
GRANDMONACOPOKERCLUB.COM
GRANDMONACOPROMOTIONS.COM
GRANDMONACORACEBOOK.COM
GRANDMONACOREWARDS.COM
GRANDMONACOSKILLGAMES.COM
GRANDMONACOSLOTS.COM
GRANDMONACOSPORTS.COM

GRANDMONACOSPORTSBOOK.COM
GRANDMONACOSTORE.COM
GRANDMONACOSUPPORT.COM
GRANDMONACOVIDEOPOKER.COM
GRANDMONACO.NET
CASINOGRANDMONACO.NET
GRANDMONACOBINGO.NET
GRANDMONACOCASINO.NET
GRANDMONACOCASINOCUB.NET
GRANDMONACOGAMES.NET
GRANDMONACOGAMING.NET
GRANDMONACOLOTTERY.NET
GRANDMONACOMILLIONS.NET
GRANDMONACOPLAYERSCLUB.NET
GRANDMONACOPOKER.NET
GRANDMONACOPOKERCLUB.NET
GRANDMONACORACEBOOK.NET
GRANDMONACOSKILLGAMES.NET
GRANDMONACOSPORTS.NET
GRANDMONACOSPORTSBOOK.NET
POKERGRANDMONACO.NET
GRANDMONACO.ORG
CASINOGRANDMONACO.ORG
GRANDMONACOCASINO.ORG
GRANDMONACOCASINOCUB.ORG
GRANDMONACOMILLIONS.ORG
GRANDMONACOPOKER.ORG
GRANDMONACOPOKERCLUB.ORG
GRANDMONACORACEBOOK.ORG
POKERGRANDMONACO.ORG

Copies of the printouts of the Whois searches are provided in Annex [A].

[9.] The registrar with whom all the domain names are registered is:

Name: Go Daddy Software Inc.

Address: 14455 N. Hayden Rd.
 Suite 219
 Scottsdale, AZ 85260
 United States of America

Telephone: +1 480 505-8899

Fax: +1 480 505-8844

E-mail: abuse@godaddy.com

IV. Jurisdictional Basis for the Administrative Proceeding
 (Rules, paras. 3(a), 3(b)(xv))

[10.] The dates on which the registration agreements of the disputed domain names were entered are detailed in the following table:

DOMAIN NAME	REGISTRATION AGREEMENT DATE
grandmonaco.com	October 23, 2004
casinograndmonaco.com	December 19, 2005
grandmonacocasino.com	June 23, 2005
deutschesgrandmonaco.com	August 3, 2006
grandmonacoayda.com	July 27, 2006
grandmonacoayuda.com	July 27, 2006
grandmonacobingo.com	January 3, 2006
grand-monaco.com	December 21, 2005
grand-monaco-casino.com	December 21, 2005
grand-monaco-poker.com	December 21, 2005
grandmonacocasinoclub.com	December 21, 2005
grandmonacoclub.com	January 3, 2006
grandmonacocraps.com	February 20, 2006
grandmonacogames.com	January 3, 2006
grandmonacogaming.com	February 20, 2006
grandmonacohost.com	April 13, 2006
grandmonacohosts.com	April 13, 2006
grandmonacolottery.com	January 3, 2006
grandmonacolotto.com	January 3, 2006

grandmonacolounge.com	April 7, 2006
grandmonacomahjong.com	August 23, 2006
grandmonacomillions.com	December 21, 2005
grandmonaconews.com	April 18, 2006
grandmonaconlinecasino.com	March 15, 2006
grandmonaconlinegaming.com	March 15, 2006
grandmonaconlinepoker.com	March 15, 2006
grandmonacopartners.com	August 23, 2006
grandmonacoplayersclub.com	April 7, 2006
grandmonacopoker.com	December 19, 2005
grandmonacopokerclub.com	December 21, 2005
grandmonacopromotions.com	February 20, 2006
grandmonacoracebook.com	February 3, 2006
grandmonacorewards.com	May 31, 2006
grandmonacoskillgames.com	January 3, 2006
grandmonacoslots.com	January 3, 2006
grandmonacosports.com	January 3, 2006
grandmonacosportsbook.com	January 3, 2006
grandmonacostore.com	January 3, 2006
grandmonacosupport.com	May 31, 2006
grandmonacovideopoker.com	February 20, 2006
grandmonaco.net	December 19, 2005
casinograndmonaco.net	December 19, 2005
grandmonacobingo.net	January 3, 2006
grandmonacocasino.net	December 19, 2005
grandmonacocasinoclub.net	December 21, 2005
grandmonacogames.net	February 20, 2006
grandmonacogaming.net	February 20, 2006
grandmonacolottery.net	January 3, 2006
grandmonacomillions.net	December 21, 2005
grandmonacoplayersclub.net	April 7, 2006
grandmonacopoker.net	December 19, 2005
grandmonacopokerclub.net	December 21, 2005
grandmonacoracebook.net	February 3, 2006
grandmonacoskillgames.net	January 3, 2006

grandmonacosports.net	January 3, 2006
grandmonacosportsbook.net	January 3, 2006
pokergrandmonaco.net	December 19, 2005
grandmonaco.org	December 19, 2005
casinograndmonaco.org	December 19, 2005
grandmonacocasino.org	December 19, 2005
grandmonacocasinoclub.org	December 21, 2005
grandmonacomillions.org	December 21, 2005
grandmonacopoker.org	December 19, 2005
grandmonacopokerclub.org	December 21, 2005
grandmonacoracebook.org	February 3, 2006
pokergrandmonaco.org	December 19, 2005

All the registration agreements incorporate the Policy. A true and correct copy of the Policy that applies to the domain names in question is provided as Annex [B] to this Complaint.

V. Factual and Legal Grounds

(Policy, paras. 4(a), (b), (c); Rules, para. 3)

[11.] This Complaint is based on the following grounds:

A. The domain names are identical or confusingly similar to a trademark or service mark in which the Complainant has rights;

(Policy, para. 4(a)(i), Rules, paras. 3(b)(viii), (b)(ix)(1))

- The Société des Bains de Mer has been operating the Casino de Monte Carlo in Monaco for more than 140 years at the date of this complaint. The casino has become famous worldwide as one of the most significant symbols of the Principauté de Monaco. It attracts a clientele that comes from numerous European and non-European countries.
- The Société des Bains de Mer is the founder and manager of the Casino de Monte Carlo in Monaco. Since April 2, 1863, the Société des Bains de Mer has been granted by the authorities of the Principauté de Monaco a

monopoly for casino and gambling industries for the territory of the Principauté de Monaco, and is therefore the sole company that can organize games and gambling in Monaco (*Privilège des Jeux*, renewed for the last time by the *Ordonnance Souveraine* n°8834 of 24 March 1987, a copy of this *Ordonnance* is attached in Annex [C]).

- Complainant has registered several trademarks including the international word mark "Casino de Monaco" which was registered on 19 December 2002; see Annex [D], and the comparable United States Federal trademark application filed on 24 December 2002 placed as Annex [E].
- All the disputed domains are confusingly similar to the Complainant's trademarks. They all contain the terms "Grand" and "Monaco" and many of them include an additional term:

(1) The domain names composed of the terms "Grand", "Monaco" and "Casino"

This concerns the following disputed domain names:

- casinograndmonaco.com
- grandmonacocasino.com
- grand-monaco-casino.com
- casinograndmonaco.net
- grandmonacocasino.net
- casinograndmonaco.org
- grandmonacocasino.org

These domain names are confusingly similar to the Complainant's trademark as they incorporate both nouns, "Casino" and "Monaco", of Complainant's trademarks. Having inverted the order of the nouns in the mark does not render the following disputed domain names dissimilar from the Complainant's trademarks: grandmonacocasino.com; grand-monaco-casino.com; grandmonacocasino.net and grandmonacocasino.org. The inversion merely reflects a difference in usage or placement of the adjectively used noun (Monaco) in relation to the principal noun (casino) between the French and the English language. The WIPO Panel arrived to a

similar conclusion in the matter D2005-0527 regarding the domain name <montecarloresortcasino.com> as it stated: *"The disputed domain name incorporates the two nouns of Complainant's trademark "Monte Carlo" and "casino", the combination of which is distinctive for, and immediately brings to mind Complainant's business activities. These two nouns are the most distinctive part both in Complainant's trademark and the domain name at issue. The preposition "de" has little distinguishing effect, and even more so the omission of it in the domain name at issue."*

The addition of the generic term "grand" does not render the disputed domain names dissimilar or legally different from the Complainant's trademark. In decision D2000-0253, a WIPO Panel found that *"The domain name in issue — QUIXTARMORTGAGE.COM — is legally identical to Complainant's mark, QUIXTAR. The addition of the generic terms "MORTGAGE" and ".COM" to the domain name in dispute has little, if any, affect on a determination of legal identity between the domain name and the mark."*

"Grand" is moreover frequently associated with the casino business as many casinos are simply called "Grand Casino" such as the casinos in Biloxi and Gulfport (Mississippi), Coushatta (Louisiana), Mille Lacs (Minnesota), Helsinki (Finland), MGM Grand in Las Vegas (Nevada) and Detroit (Michigan), and Baden and Luzern (Switzerland). The term "Grand" is a French word meaning large, great, lavish, sublime or sumptuous and therefore naturally applies to casinos wishing to convey a luxurious and prestigious image to the public. In WIPO decision D2004-0415, the panel found, as concerns the domain <monte-carlogrand.com>, that: *"Furthermore, the addition of the term "grand" to the domain name number two does not detract from the similarity to the Complainant's trademark. The Complainant has sufficiently evidenced, in the opinion of the Panel, that such term is strongly linked to the casino industry. Such relationship is evidenced not only by the fact that a renowned casino of Las Vegas is identified with such term, but also due to the large number of entries found with the search engine "Google" when the terms "grand" and "casino" are independently entered, or the joint term "grand casino" (such fact is also confirmed by the circumstance that the "Casino Gran Madrid", located in Madrid, includes in*

its name the translation of the term "grand" into Spanish). This Panel has verified, through these searches, that this term is commonly used in the casino industry and, consequently, the addition and association of "grand" to the term "Monte-Carlo" evokes the Casino de Monte-Carlo." Similar decisions have been rendered by WIPO arbitration panels in D2005-0404 regarding the domain name <luckymontecarlocasino.com>, in D2000-1328 regarding the domain name <montecarlojackpot.com> and in D2005-1342 regarding the domain name <montecarlograndcasino.com>.

All these elements show that the Respondents' domain names composed of the terms "Grand", "Monaco" and "Casino" are confusingly similar to the prior trademarks in which the Complainant has rights.

(2) The domain names composed of the terms "Grand", "Monaco", "Casino" and a generic term

This concerns the following disputed domain names:

- grandmonacocasinoclub.com
- grandmonacoonlinecasino.com
- grandmonacocasinoclub.net
- grandmonacocasinoclub.org

In addition to the arguments raised in paragraph (1) above, the Complainant would like to point out that having added the generic term "club" or "online" to the disputed domain names does not render them dissimilar from the Complainant's trademark. On the contrary, the generic terms "club" and "online" strengthen the confusion since the first one refers to the fact that non virtual casinos are often organized in games circles, societies and the second one induces that e-gaming services are offered by the well-know Casino de Monte-Carlo in Monaco. A WIPO Panel found in the WIPO decision D2000-1425 on <creditlyonnaisonline.com> that:

"CREDIT LYONNAIS" is Complainant's registered trademark. The domain name "creditlyonnaisonline.com" is confusingly similar to Complainant's trademark. The addition of the terms "online" is not sufficient to avoid confusion. On the contrary, the word "online" strengthens the confusion since it induces e-banking services offered by this worldwide known banking

operator. With regard to avoiding confusion, the addition of the top level domain name ".com" is irrelevant."

As a consequence, the Respondents' domain names composed of the terms "Grand", "Monaco", "Casino" and a generic term such as "club" or "online" are confusingly similar to the prior trademarks in which the Complainant has rights.

(3) The domain names only composed of the terms "Grand" and "Monaco"

This concerns the following disputed domain names:

- grandmonaco.com
- grand-monaco.com
- grandmonaco.net
- grandmonaco.org

As already mentioned in paragraph (1) above, the word "Grand" is frequently associated with the casino business. So is the word "Monaco" as the Principality of Monaco has a long-standing worldwide reputation with respect to the casino activities that are offered on its territory.

Therefore, when the term "Grand" is associated with "Monaco", it necessarily induces, for the public, the Casino de Monte-Carlo in Monaco as already found by a WIPO Panel in decision D2004-0415 concerning the domain <monte-carlogrand.com> (see paragraph (1) above).

Therefore, the Respondents' domain names composed of the two terms "Grand" and "Monaco" are confusingly similar to the prior trademarks in which the Complainant has rights.

(4) The domain names composed of the terms "Grand", "Monaco" and a generic term related to casino business

This concerns the following disputed domain names:

- grandmonacobingo.com

- grand-monaco-poker.com
- grandmonacocraps.com
- grandmonacogames.com
- grandmonacolottery.com
- grandmonacolotto.com
- grandmonacogaming.com
- grandmonacomahjong.com
- grandmonacomillions.com
- grandmonacoonlinegaming.com
- grandmonacoonlinepoker.com
- grandmonacoplayersclub.com
- grandmonacopoker.com
- grandmonacopokerclub.com
- grandmonacoracebook.com
- grandmonacorewards.com
- grandmonacoskillgames.com
- grandmonacoslots.com
- grandmonacovideopoker.com
- grandmonacobingo.net
- grandmonacogames.net
- grandmonacogaming.net
- grandmonacolottery.net
- grandmonacomillions.net
- grandmonacoplayersclub.net
- grandmonacopoker.net
- grandmonacopokerclub.net
- grandmonacoracebook.net
- grandmonacoskillgames.net
- pokergrandmonaco.net
- grandmonacomillions.org
- grandmonacopoker.org
- grandmonacopokerclub.org
- grandmonacoracebook.org
- pokergrandmonaco.org
- grandmonacosports.com
- grandmonacosportsbook.com

- grandmonacosports.net
- grandmonacosportsbook.net

The addition of a generic term related to the casino and gambling business (such as bingo, poker, craps, games, lottery rewards, slots, millions, players, etc...) before or after the term "grandmonaco" does not render the disputed domain names dissimilar or legally different from the Complainant's trademark. On the contrary, these words strengthen the association that the public can make between these domains and the Complainant's famous casino.

The WIPO Panel arrived to a similar conclusion in the matter D2000-1332 regarding the domain name <monacogambling.com> as it stated: *"While it is not identical to the Domain Name, this registered trademark is similar if only by the ideas suggested by it, to the Domain Name "monacogambling.com", registered by the Respondent. The Panel is of the opinion that the registered words "Monaco" and "Gambling" are essentially synonyms to the words "Monte-Carlo" and "Casino", which happen to be the principal elements in the Complainant's Trademark. The Panel, applying its judicial knowledge is of the opinion that even though Monaco is the Principauté and Monte-Carlo is the city within this Principauté, these terms are used interchangeably by the public at large. The words ("monaco" and "gambling") used together create a strong similarity and impression that could easily induce the general public into believing that the Domain Name, the Domain Name proprietor and any web site operated from the Domain Name are associated with the Complainant."* A similar decision has been rendered by WIPO arbitration Panel in D2000-1328 regarding the domain name <montecarlojackpot.com>.

In addition, as concerns the generic terms "sports" and "sportsbook", the WIPO Panel already stated in D2005-0225 regarding the domain name <montecarlocasinoandsportsbook.com> that:

"The domain name at issue is not identical to a trade mark held by Complainant, and the question is then whether there is confusing similarity. The disputed domain name incorporates the two nouns "Monte-Carlo" and "Casino" of Complainant's trademark CASINO DE MONTE-CARLO with the addition of the term "sports book".

The terms "Monte-Carlo" and "Casino" are distinctive of, and immediately bring to mind Complainant's business activities.

As evidenced by the Complainant, "sports book" is a term that could easily be associated with casinos, the business of Complainant, as several casinos offers the possibility for their clients to wager on sports results in addition to their standard casino gambling activities, and the term "sports book" stands for the possibility of such betting on sports games. The Panel therefore finds that the term "sports book" is not distinguishing the domain name at issue from Complainant's trademark, but rather adds to the likelihood of confusion.

As a result of the above arguments, the Panel finds that the disputed domain name is confusingly similar to Complainant's trademark CASINO DE MONTE-CARLO."

The Respondents' domain names above are therefore confusingly similar to the prior trademarks in which the Complainant has rights.

(5) The domain names composed of the terms "Grand", "Monaco" and a generic term

- grandmonacoayda.com
- grandmonacoayuda.com
- grandmonacoclub.com
- grandmonacohost.com
- grandmonacohosts.com
- grandmonacolounge.com
- grandmonaconews.com
- grandmonacopartners.com
- grandmonacopromotions.com
- grandmonacostore.com
- grandmonacosupport.com

The addition of a generic term such as "host", "lounge", "club", "ayuda", "store", "news", "support" or "partners" to the terms "Grand" and "Monaco" does not render the disputed domain names dissimilar or legally different from the Complainant's trademark.

Indeed, these generic terms have no distinctive value that would be strong enough to surpass the distinctiveness of the association of the terms "Grand" and "Monaco". Therefore, these generic terms are unable to cancel the strong risk of confusion that exists between the terms "Grand" and "Monaco" and the Complainant's trademarks. Moreover, these generic terms would rather be perceived as mere declinations of the domain names at stake: the "news" of the Grand Monaco, the "store" of the Grand Monaco, the "support" of the Grand Monaco, etc....

Moreover, all these disputed domain names point to the same online casino website (the homepage of the website to which the disputed domain names are pointing is attached in Annex [F]). This induces the general public into believing that the disputed domain names are associated with the Complainant.

As a consequence, the domain names composed of the terms "Grand", "Monaco" and a generic term are confusingly similar to the Complainant's trademarks.

(6) The domain name <deutschesgrandmonaco.com>

The addition of the generic term "deutsches" to "Grandmonaco" does not render the disputed domain names dissimilar or legally different from the Complainant's trademark especially as the term "deutsches" means German in German language and points to the casino website attached in Annex [F] in its German-language version (see Annex [G]). Therefore, the addition of the term "deutsches" to the term "grandmonaco" induces the German public into believing that the disputed domain name is associated with the Complainant and is the German-language version of the Complainant's website.

Therefore, this disputed domain name is undoubtedly confusingly similar with the trademark owned by the Complainant.

B. The Respondents have no rights or legitimate interests in respect of the domain names:

(Policy, para. 4(a)(ii), Rules, para. 3(b)(ix)(2))

- The Complainant has searched Trademark database for possible trademark registrations or applications by the Respondents. It seems that no trademarks including the words "Grand" and "Monaco" have been registered by the Respondents in neither the United States of America nor any of the European countries. A copy of the results of this research is attached in Annex [H]. To the best of Complainant's knowledge, Respondents hold no intellectual property rights over any mark that contains the terms "Grand" and "Monaco".
- In addition, the Respondents are individuals residing in the United Kingdom (See the Whois information in Annex [A]), that is to say they have no geographical link with the Principauté de Monaco.
- Also the Respondents have not received any license or authorization from the authorities of the Principauté de Monaco to operate a casino in Monaco.
- Complainant has never authorized Respondents to use its 140-year old famous marks Casino de Monaco or Casino de Monte Carlo, nor to register and use the disputed domain names, and Complainant does not have any type of business relationship with Respondents.

The Respondents therefore have no rights or legitimate interests in the disputed domain names.

C. The domain names were registered and are being used in bad faith.

(Policy, paras. 4(a)(iii), 4(b); Rules, para. 3(b)(ix)(3))

- The Respondents are professionals in the gambling business. In fact, an Internet search on Respondents' name shows that M. Lucan Toh is the CEO of PlayShare, a UK company which presents itself as "*the new integrated*

operating platform behind the world class poker and casino gaming sites PokerShare.com and CasinoShare.com" (see Annex [I] a) and that M. Max Wright is Director of the gaming websites PokerShare.com and CasinoShare.com (both owned and operated by PlayShare) (see Annex [I] c). Moreover, an Internet search on Respondents' domain names shows that Respondents' website is operated by the Grand Gaming Group, which has been acquired by the PlayShare Group on November 1st 2006. Play Share Group has disclosed in the press that it is seeking *"to be one of the top 5 gaming companies within the next two years"* (see Annex [I] b).

- As managers of a gaming company, Respondents can only have been acting in bad faith when they registered the disputed domain names knowing that they were confusingly similar to Complainant's famous casino in Monaco. The strong notoriety and world renown of Complainant's marks make it impossible for Respondents to claim that they ignored that the registration of the disputed domain names would violate Complainant's rights.

Moreover, Complainant has a strong policy of protection for its famous marks. In this respect, WIPO already ordered the transfer of many domain names to the Complainant, see Annex [J]. Respondents, who are professionals in the gaming business, were necessarily aware of, or should have reasonably been aware of, the fact that Complainant has a strong policy in protecting and enforcing its intellectual property rights and preserving its reputation and renown from being unduly used by third parties.

- The fact that Respondents have taken the precaution of mentioning at the bottom of each page of the disputed domain names the following disclaimer: *"Grand Monaco is a Hillstead Limited, Gibraltar site - now a member of the PlayShare group. Grand Monaco is in NO way associated with the Principality of Monaco, nor ANY of the land-based casino operations located in that jurisdiction. Grand Monaco is an independent operation."* is another proof of the Respondents' bad faith (see Annex [K]). If Respondents have considered it necessary to draw the attention of Internet users on the fact that Grand Monaco is not associated with the Principality of Monaco it is obviously because they knew that there is undoubtedly a risk of

confusion with Complainant's famous casino in Monaco. Moreover the discretion of this warning which appears at the bottom of the disputed domain names' pages in small characters is another clear example of Respondents' bad faith.

Also, the presence of a discrete disclaimer on the website itself does not alter the Respondents' bad faith as Internet users cannot see this disclaimer when they type the disputed domain names in their Internet browser. It is at that time that they are attracted by these domain names and that there is a confusion with the Complainant's famous casino in Monaco.

- In addition, the Respondents are passing off on Complainant's trademarks and renown in order to attract Internet users for commercial gain and therefore clearly falls within the example given in the Policy's article 4.b.iv. The value of the disputed domain names for a professional in the online casino business lies in their close resemblance and confusability with Complainant's registered trademark. The WIPO Panel arrived to a similar decision in decision D2003-0246 regarding the domain name <swisscasino.com>. Indeed, except for the following disputed domain names:

<grand-monaco-poker.com>
 <grandmonacoonlinepoker.com>
 <grandmonacopoker.com>
 <grandmonacopokerclub.com>
 <grandmonacovideopoker.com>
 <grandmonacopoker.net>
 <grandmonacopokerclub.net>
 <pokergrandmonaco.net>
 <grandmonacopoker.org>
 <grandmonacopokerclub.org>
 <pokergrandmonaco.org>

all the disputed domain names point to the same casino website.

- Clearly, Internet users who type the disputed domain names in their browser would believe that they access a gambling website operated by the owner of

the well-known casino in Monaco, Complainant, while this is not the case. This is obviously a source of confusion for Internet users.

- Creating such strong likelihood of confusion between Complainant's casino and the Respondents' website is a clear example of bad faith not only during the registration process of the disputed domain names but also in the use of disputed domain names.
- As per the above mentioned domain names which do not point directly to a casino website (see Annex [L]), they are nevertheless also used in bad faith. Indeed, the currently inactive use of the disputed domain names clearly shows bad faith. The disputed domain names were registered one year ago but have yet to be used in an active manner. As Respondents clearly know how to create websites it must be gathered that one year has been ample time to create websites for the disputed domain names and therefore, at this stage, it can only be concluded that the Respondents have acquired the disputed domain names to prevent Complainant from using them. Such a passive use demonstrates bad faith use and registration of the disputed domain names as exemplified in the Policy's article 4.b.ii.
- Should Respondents nevertheless claim to have registered the disputed domain names with the intent of an active use, it cannot be imagined how this could be done in a legitimate manner since Respondents are the owner of an online casino. Should Respondents wish to put the disputed domain names to use they will most likely be used to forward Internet users to the casino website to which all the other disputed domain names already point.

From the outset of the UDRP arbitration procedure the WIPO Mediation and Arbitration center found that inactive use of a domain name could constitute bad faith as stated in decision D2000-0003 regarding the domain name <Telstra.org>. Decision D2000-0028 regarding the domain name <cellularonechina.com> moreover found that inactive use of a registered domain name may be evidence of intent to sell the domain name for

commercial gain¹. A similar matter to the one that is subject matter of this arbitration was presented to the WIPO Mediation and Arbitration center in case D2005-1342 concerning the domain name

<montecarlograndcasino.com> in which the WIPO Panel decided that:

"As far as the question is concerned, whether the Respondent uses the disputed domain names in bad faith, it appears from the information available to the Panel that they are not in use since they are not linked with an active website.

Since the Telstra case (Telstra Corporation Limited v. Nuclear Marshmallows, WIPO Case No. D2000-0003), various administrative panels held that the passive use of a domain name constitutes bad faith registration and use under certain circumstances. The panel of that case noted that the question whether inactivity by the respondent constitutes bad faith depends "on the particular facts of a specific case" and that the "Administrative Panel must give close attention to all circumstances of the Respondent's behavior".

The Respondent has engaged in "passive holding" of the domain names at issue. The Respondent has also failed to file a response or make any attempt to traverse the claims and submissions made by the Complainant.

Moreover, the Respondent must have been aware of the Complainant and therefore, intentionally chose to register the domain names. Any attempt to actively use any of the two domain names at issue would inevitably lead to a likelihood of confusion to the source, sponsorship, affiliation, or endorsement of the registrant's website among Internet users who would inevitably be led to believe that such website would be owned by, controlled by, established by or in some way associated with the Complainant (Ladbroke Group Plc v. Sonoma International LDC, WIPO Case No. D2002-0131).

Such use could start at Respondent's choice any day and would be clearly contrary to the Complainant's legal rights and legitimate interests. As stated in previous UDRP decisions, "to argue that the Complainant should have to wait for some future use of the disputed domain names to occur in order to demonstrate Respondent's bad faith use is to render intellectual property law into an instrument of abuse by the Respondent. The fact that this misappropriation may occur in any as yet undetermined manner at an uncertain future date does negate the Respondent's bad faith. On the contrary, it raises the specter of continuing bad faith abuse by the Respondent of the Complainant's trademarks and legitimate business

¹ *"While in most situations of non-use, it may be impossible to draw any conclusion about a party's intent to sell, the facts here do permit such an inference. It has been noted that the Domain Name contains only Complainant's coined registered trademark and the country name "China." It would be difficult, perhaps impossible, for Respondent to use the Domain Name as the name of any business, product or service for which it would be commercially useful without violating Complainant's rights. Accordingly, in the absence of any claim by the Respondent that he intends to do otherwise, it is a permissible inference to conclude, and the Panel does conclude, that subparagraph (i) is applicable to the instant situation."*

interests" (Cellular One Group v. Paul Brien, WIPO Case No. D2000-0028; Myer Stores Limited v. David John Singh, WIPO Case No. D2001-0763; Comerica Inc. v. Horoshty, Inc., WIPO Case No. D2004-0615)."

All these elements, and *inter alia* the world renown of the Complainant's trademarks, show that the disputed domain names have both been registered and used in bad faith by the Respondents.

VI. Remedies Requested

(Rules, para. 3(b)(x))

[12.] In accordance with Paragraph 4(i) of the Policy, for the reasons described in Section V above, the Complainant requests the Administrative Panel appointed in this administrative proceeding issue a decision that the contested domain names:

grandmonaco.com
 casinograndmonaco.com
 grandmonacocasino.com
 deutschesgrandmonaco.com
 grandmonacoayda.com
 grandmonacoayuda.com
 grandmonacobingo.com
 grand-monaco.com
 grand-monaco-casino.com
 grand-monaco-poker.com
 grandmonacocasinoclub.com
 grandmonacoclub.com
 grandmonacocraps.com
 grandmonacogames.com
 grandmonacogaming.com
 grandmonacohost.com
 grandmonacohosts.com
 grandmonacolottery.com
 grandmonacolotio.com
 grandmonacolounge.com
 grandmonacomahjong.com
 grandmonacomillions.com
 grandmonaconews.com
 grandmonaonlinecasino.com
 grandmonaonlinegaming.com
 grandmonaonlinepoker.com
 grandmonacopartners.com
 grandmonacoplayersclub.com
 grandmonacopoker.com
 grandmonacopokerclub.com
 grandmonacopromotions.com
 grandmonacoracebook.com
 grandmonacorewards.com

grandmonacoskillgames.com
 grandmonacoslots.com
 grandmonacosports.com
 grandmonacosportsbook.com
 grandmonacostore.com
 grandmonacosupport.com
 grandmonacovideopoker.com
 grandmonaco.net
 casinograndmonaco.net
 grandmonacobingo.net
 grandmonacocasino.net
 grandmonacocasinoclub.net
 grandmonacogames.net
 grandmonacogaming.net
 grandmonacolottery.net
 grandmonacomillions.net
 grandmonacoplayersclub.net
 grandmonacopoker.net
 grandmonacopokerclub.net
 grandmonacoracebook.net
 grandmonacoskillgames.net
 grandmonacosports.net
 grandmonacosportsbook.net
 pokergrandmonaco.net
 grandmonaco.org
 casinograndmonaco.org
 grandmonacocasino.org
 grandmonacocasinoclub.org
 grandmonacomillions.org
 grandmonacopoker.org
 grandmonacopokerclub.org
 grandmonacoracebook.org
 pokergrandmonaco.org

be transferred to the Complainant.

VII. Administrative Panel

(Rules, para. 3(b)(iv))

[13.] The Complainant elects to have the dispute decided by a single-member Administrative Panel.

If the Respondents choose the three-member Administrative Panel, the Complainant provides the following names of three persons, one of whom the Center shall attempt to appoint to the Administrative Panel in accordance with

Paragraph 6 of the Rules and Paragraph 7 of the Supplemental Rules: François Dessemontet, Dawn Osborne and Christophe Caron.

VIII. Mutual Jurisdiction

(Rules, para. 3(b)(xiii))

[14.] In accordance with Paragraph 3(b)(xiii) of the Rules, the Complainant will submit, with respect to any challenges that may be made by the Respondents to a decision by the Administrative Panel to transfer or cancel the domain names that are the subject of this Complaint, to the jurisdiction of the courts of the United States of America, where the Registrar is located.

IX. Other Legal Proceedings

(Rules, para. 3(b)(xi))

[15.] The disputed domain names are not currently subject to any other legal proceedings.

X. Communications

(Rules, paras. 2(b), 3(b)(xii); Supplemental Rules, paras. 3, 4)

[16.] A copy of this amended Complaint, together with the cover sheet as prescribed by the Supplemental Rules, has been sent or transmitted to M. Lucan Toh and Max Wright on by email (calan.horsman@playshare.com) and a hardcopy version of the Complaint and annexes have been sent by courier service.

[17.] A copy of this amended Complaint has been sent or transmitted to the concerned registrar on March 21, 2007 by fax to Laurie Anderson (+1 480 505 8844) and a hardcopy of the Complaint and annexes was sent by mail.

[18.] This amended Complaint is submitted to the Center in electronic form, and in four (4) hardcopy sets together with the original.

XI. Payment

(Rules, para. 19; Supplemental Rules, Annex D)

[19.] As required by the Rules and Supplemental Rules, payment in the amount of USD 6,000 has been made by electronic transfer.

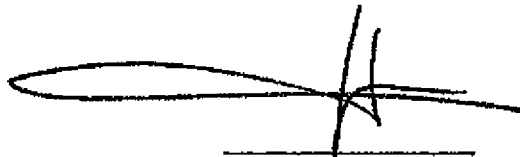
XII. Certification

(Rules, para. 3(b)(xiv))

[20.] The Complainant agrees that its claims and remedies concerning the registration of the domain names, the dispute, or the dispute's resolution shall be solely against the domain names holder and waives all such claims and remedies against (a) the WIPO Arbitration and Mediation Center and Panelists, except in the case of deliberate wrongdoing, (b) the concerned registrar, (c) the registry administrator, (d) the Internet Corporation for Assigned Names and Numbers, as well as their directors, officers, employees, and agents.

[21.] The Complainant certifies that the information contained in this Complaint is to the best of the Complainant's knowledge complete and accurate, that this Complaint is not being presented for any improper purpose, such as to harass, and that the assertions in this Complaint are warranted under the Rules and under applicable law, as it now exists or as it may be extended by a good-faith and reasonable argument.

Respectfully submitted,

A handwritten signature in black ink, consisting of a long horizontal stroke followed by a vertical stroke and a small loop at the end.

Julien Horn

Date: 21 March, 2007

ANNEXES

- Annex [A] Printouts of the WhoIs information concerning the disputed domain names ;
- Annex [B] ICANN domain name dispute policy ;
- Annex [C] Ordonnance Souveraine n°8834 of March 24, 1987 ;
- Annex [D] International Trademark "Casino de Monaco", WO 793812 ;
- Annex [E] Complainant's United States Federal trademark, US 76478796 ;
- Annex [F] Homepage of the website to which the disputed domain names (except those mentioned in section C.) are pointing ;
- Annex [G] Homepage of the website to which the disputed domain name <deutschesgrandmonaco.com > is pointing ;
- Annex [H] Result of the search for any trademarks held by the Respondents ;
- Annex [I]
 - a) Printout of the PR Web press release;
 - b) Printout of the Microgaming Casinos page;
 - c) Printout of Igaming Business website;
- Annex [J] List of Complainant's WIPO cases
- Annex [K] Pages of the website to which the disputed domain names (except those mentioned in section C.) are pointing
- Annex [L] Pages to which the domain names listed in section C. are pointing

WhoIs Search Results

Page 1 of 2

Start a domain search: .com 24/7 Sales & Support: (480) 565-8877 Today's Offers **SALE**

GoDaddy Make a .com name with us!

SPECIAL OFFER for Registrars Customers!

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DISCOUNT DOMAIN CLUB Exclusive Discounts on domain purchases!

Bob Parsons.com Registeredly given to alleged bad guy. Missing funds, escort services, cocaine surgery, oh my!

Domains | Hosting & Servers | Email | Site Builders | Business | SSL Certificates | Domain Auctions | Reseller Plans

WHOIS Search Results for: **CASINOGRANDMONACO.COM**

Search Again
Enter a Domain Name to Check .com **GO**

The data contained in GoDaddy.com, Inc.'s WHOIS database, while believed by the company to be reliable, is provided "as is" with no guarantee or warranties regarding its accuracy. This information is provided for the sole purpose of assisting you in obtaining information about domain name registration records. Any use of this data for any other purpose is expressly forbidden without the prior written permission of GoDaddy.com, Inc. By submitting an inquiry, you agree to these terms of usage and limitations of warranty. In particular, you agree not to use this data to allow, enable, or otherwise make possible, dissemination or collection of this data, in part or in its entirety, for any purpose, such as the transmission of unsolicited advertising and solicitations of any kind, including spam. You further agree not to use this data to enable high volume, automated or robotic electronic processes designed to collect or compile this data for any purpose, including mining this data for your own personal or commercial purposes.

Please note: the registrant of the domain name is specified in the "registrant" field. In most cases, GoDaddy.com, Inc. is not the registrant of domain names listed in this database.

Registrant:
Max Wright
46 Berkeley Square
London, W1J 5AT
United Kingdom

Registered through: GoDaddy.com, Inc. (<http://www.godaddy.com>)
Domain Name: CASINOGRANDMONACO.COM
Created on: 19-Dec-05
Expires on: 19-Dec-07
Last Updated on: 19-Dec-06

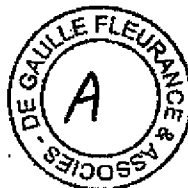
Administrative Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley Square
London, W1J 5AT
United Kingdom
2075884064

Technical Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley Square
London, W1J 5AT
United Kingdom
2075884064

Domain servers in listed order:
PARK21.SECURESERVER.NET
PARK22.SECURESERVER.NET

Registry Status: ok

See Underlying Registry Data
Report Invalid Whois



Available TLDs

- ☐ CASINOGRANDMONACO. \$0.99/yr SAVE! INFO
- ☐ CASINOGRANDMONACO. \$6.99/yr SAVE! BZ
- ☐ CASINOGRANDMONACO.LUS \$7.99/yr
- ☐ CASINOGRANDMONACO. \$6.99/yr NAME
- ☐ You might also consider:
- ☐ CASINOGRANDMONACOONLINE.COM \$0.99/yr
- ☐ ONLINECASINOGRANDMONACO.COM \$0.99/yr
- ☐ CASINOGRANDMONACONET \$0.99/yr
- ☐ HOMECASINOGRANDMONACO.NET \$0.99/yr
- ☐ CASINOGRANDMONACOSIT \$0.99/yr
- ☐ SITECASINOGRANDMONACO \$0.99/yr
- ☐ CASINOGRANDMONACOWEB \$0.99/yr SAVE! INFO
- ☐ WEBCASINOGRANDMONACO.COM \$0.99/yr SAVE! INFO
- ☐ CASINOGRANDMONACOLIV \$6.99/yr SAVE! E. BZ
- ☐ LIVECASINOGRANDMONACO \$6.99/yr SAVE! O. BZ
- ☐ CASINOGRANDMONACOBLOG \$7.99/yr G. LUS

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WINNER

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Technology

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Technology

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Technology

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Page 1 of 2

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United Kingdom
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Domain servers in listed order:
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PARK22.SECURESERVER.NET

Registry Status: ok

[See Underlying Registry Data](#)
[Report Invalid Whois](#)

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☐ CASINOGRANDMONACO. \$0.99/yr SAVE! INFO

☐ CASINOGRANDMONACO. \$0.99/yr SAVE! BIZ

☒ CASINOGRANDMONACO.US \$7.99/yr

☐ CASINOGRANDMONACO. \$0.99/yr NAME

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☐ CASINOGRANDMONACOSTE. \$3.99/yr E.ORG

☐ SITECASINOGRANDMONACO. \$0.99/yr Q.ORG

☐ CASINOGRANDMONACOWEST.US \$9/yr SAVE! INFO

☐ WEB.CASINOGRANDMONACOWEST.US \$9/yr SAVE! INFO

☐ CASINOGRANDMONACOLIVE. \$0.99/yr SAVE! E.BIZ

☐ LIVECASINOGRANDMONACO. \$0.99/yr SAVE! Q.BIZ

☐ CASINOGRANDMONACOBLOK. \$9/yr G.US

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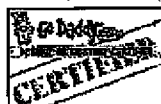
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noms de domaine

Fermer cette fenêtre

WHOIS casinograndmonaco.org

Voici la réponse intégrale, sans modification, du serveur de l'organisme de gestion de ce nom de domaine. Il n'est pas mis à jour dès l'enregistrement, mais parfois jusqu'à 24h après.

NOTICE: Access to .ORG WHOIS information is provided to assist persons in determining the contents of a domain name registration record in the Public Interest Registry registry database. The data in this record is provided by Public Interest Registry for informational purposes only, and Public Interest Registry does not guarantee its accuracy. This service is intended only for query-based access. You agree that you will use this data only for lawful purposes and that, under no circumstances will you use this data to: (a) allow, enable, or otherwise support the transmission by e-mail, telephone, or facsimile of mass unsolicited, commercial advertising or solicitations to entities other than the data recipient's own existing customers; or (b) enable high volume, automated, electronic processes that send queries or data to the systems of Registry Operator or any ICANN-Accredited Registrar, except as reasonably necessary to register domain names or modify existing registrations. All rights reserved. Public Interest Registry reserves the right to modify these terms at any time. By submitting this query, you agree to abide by this policy.

Domain ID:D109657496-LROR
 Domain Name:CASINOGRANDMONACO.ORG
 Created On:19-Dec-2005 06:51:49 UTC
 Last Updated On:19-Dec-2006 10:02:38 UTC
 Expiration Date:19-Dec-2007 06:51:49 UTC
 Sponsoring Registrar:Go Daddy Software, Inc. (R91-LROR)
 Status:OK
 Registrant ID:GODA-025057993
 Registrant Name:Max Wright
 Registrant Street1:46 berkeley square
 Registrant Street2:
 Registrant Street3:
 Registrant City:London
 Registrant State/Province:
 Registrant Postal Code:w1j 5at
 Registrant Country:GB
 Registrant Phone:+44.2075984064
 Registrant Phone Ext.:
 Registrant FAX:
 Registrant FAX Ext.:
 Registrant Email:calan.horsman@playshare.com
 Admin ID:GODA-225057993
 Admin Name:Max Wright
 Admin Street1:46 berkeley square
 Admin Street2:
 Admin Street3:
 Admin City:London
 Admin State/Province:
 Admin Postal Code:w1j 5at
 Admin Country:GB
 Admin Phone:+44.2075984064
 Admin Phone Ext.:
 Admin FAX:
 Admin FAX Ext.:
 Admin Email:calan.horsman@playshare.com
 Tech ID:GODA-125057993
 Tech Name:Max Wright
 Tech Street1:46 berkeley square
 Tech Street2:
 Tech Street3:
 Tech City:London
 Tech State/Province:
 Tech Postal Code:w1j 5at
 Tech Country:GB
 Tech Phone:+44.2075984064
 Tech Phone Ext.:
 Tech FAX:
 Tech FAX Ext.:
 Tech Email:calan.horsman@playshare.com
 Name Server:PAK21.SECURESERVER.NET
 Name Server:PAK22.SECURESERVER.NET
 Name Server:
 Name Server:
 Name Server:
 Name Server:
 Name Server:

INDOM - Noms de domaine

Page 2 of 2

Name Server:
Name Server:
Name Server:
Name Server:
Name Server:
Name Server:

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Registrant:
Max Wright
46 Berkeley square
London, w1j 5st
United Kingdom

Registered through: GoDaddy.com, Inc. (<http://www.godaddy.com>)
Domain Name: DEUTSCHESGRANDMONACQ.COM
Created on: 03-Aug-06
Expires on: 03-Aug-07
Last Updated on: 08-Nov-06

Administrative Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley square
London, w1j 5st
United Kingdom
2075984064

Technical Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley square
London, w1j 5st
United Kingdom
2075984064

Domain servers in listed order:
PARK29.SECURESERVER.NET
PARK30.SECURESERVER.NET

Registry Status: ok

[See Underlying Registry Data](#)
[Report Invalid Whois](#)

Available TLDs

- ☐ DEUTSCHESGRANDMONACQ.884Yr NET
- ☐ DEUTSCHESGRANDMONACQ.884Yr ORG
- ☐ DEUTSCHESGRANDMONACQ.884Yr SAVE INFO
- ☐ DEUTSCHESGRANDMONACQ.884Yr SAVE BIZ
- ☐ DEUTSCHESGRANDMONACQ.884Yr US
- ☐ DEUTSCHESGRANDMONACQ.884Yr NAME

You might also consider:

- ☐ DEUTSCHESGRANDMONACQ.884Yr ONLINE.COM
- ☐ ONLINEDEUTSCHESGRAND.884Yr MONACQ.COM
- ☐ DEUTSCHESGRANDMONACQ.884Yr HOME.NET
- ☐ HOMEDDEUTSCHESGRANDMONACQ.884Yr NACQ.NET
- ☐ DEUTSCHESGRANDMONACQ.884Yr SITE.ORG
- ☐ SITEDEUTSCHESGRANDMONACQ.884Yr NACQ.ORG
- ☐ DEUTSCHESGRANDMONACQ.884Yr SAVE WEB.INFO
- ☐ WEBDEUTSCHESGRANDMONACQ.884Yr ACC.INFO
- ☐ DEUTSCHESGRANDMONACQ.884Yr SAVE LIVE.BIZ
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Please note: the registrant of the domain name is specified in the "registrant" field. In most cases, GoDaddy.com, Inc. is not the registrant of domain names listed in this database.

Registrant:
Max Wright
46 Berkeley square
London, W1J 6AT
United Kingdom

Registered through: GoDaddy.com, Inc. (<http://www.godaddy.com>)
Domain Name: GRANDMONACOCASINO.COM
Created on: 23-Jun-05
Expires on: 23-Jun-07
Last Updated on: 09-Nov-06

Administrative Contact:
Wright, Max calen.horsman@playshare.com
46 Berkeley Square
London, W1J 5AT
United Kingdom
2075884064

Technical Contact:
Wright, Max calen.horsman@playshare.com
46 Berkeley Square
London, W1J 5AT
United Kingdom
2075984084

Domain servers in listed order:
PARK13.SECURESERVER.NET
PARK14.SECURESERVER.NET

Registry Status: ok

**See Underlying Registry Data
Report Invalid Whole**

2 Available TLDs

- ☐ GRANDMONACO CASINO. \$6.89/yr SAVEZ BIZ
- ☐ GRANDMONACO CASINO US \$7.89/yr
- ☐ GRANDMONACO CASINO. \$8.96/yr NAME
- ☒ You might also consider:
- ☐ GRANDMONACO CASINO CLUB \$9.75/yr IVE.COM
- ☐ ONLINE GRANDMONACO CASINO \$9.75/yr INFO.COM
- ☐ GRANDMONACO CASINO MOBILE \$9.88/yr E.NET
- ☒ HOME GRANDMONACO CASINO \$9.96/yr C.NET
- ☐ GRANDMONACO CASINO SIT \$9.99/yr E.ORG
- ☐ SITE GRANDMONACO CASINO \$9.99/yr O.ORG
- ☐ GRANDMONACO CASINO WEB \$9.99/yr SAVEZ INFO
- ☐ WEB GRANDMONACO CASINO \$9.99/yr SAVEZ INFO
- ☐ GRANDMONACO CASINO LIV \$9.99/yr SAVEZ E.BIZ
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WHOIS
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Registrant:
Max Wright
46 Berkeley square
London, W1J 5at
United Kingdom

Registered through: GoDaddy.com, Inc. (<http://www.godaddy.com>)
Domain Name: GRANDMONACO.COM
Created on: 23-Oct-04
Expires on: 23-Oct-07
Last Updated on: 08-Nov-06

Administrative Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley square
London, W1J 5at
United Kingdom
2075984064

Technical Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley square
London, W1J 5at
United Kingdom
2075984064

Domain servers in listed order:
PARK11.SECURESERVER.NET
PARK12.SECURESERVER.NET

Registry Status: ok

[See Underlying Registry Data](#)
[Report Invalid Whois](#)

Available TLDs

<input type="checkbox"/> GRANDMONACO.BIZ	\$8.99/yr SAVE!
<input type="checkbox"/> GRANDMONACO.BS	\$7.99/yr
<input type="checkbox"/> GRANDMONACO.NAME	\$9.99/yr
<input type="checkbox"/> You might also consider:	
<input type="checkbox"/> GRANDMONACONLINE.COM	\$8.99/yr
<input type="checkbox"/> GRANDMONACOHOMES.NET	\$8.99/yr
<input type="checkbox"/> HOMESGRANDMONACO.NET	\$8.99/yr
<input type="checkbox"/> GRANDMONACOSTE.ORG	\$8.99/yr
<input type="checkbox"/> SITEGRANDMONACO.ORG	\$8.99/yr
<input type="checkbox"/> GRANDMONACOWEB.INFO	\$8.99/yr SAVE!
<input type="checkbox"/> WEBGRANDMONACO.INFO	\$8.99/yr SAVE!
<input type="checkbox"/> GRANDMONACOLIVE.BIZ	\$8.99/yr SAVE!
<input type="checkbox"/> LIVEGRANDMONACO.BIZ	\$8.99/yr SAVE!
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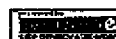
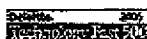
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WHOIS

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Please note: the registrant of the domain name is specified in the "registrant" field. In most cases, GoDaddy.com, Inc. is not the registrant of domain names listed in this database.

Registrant:
Max Wright
46 Berkeley Square
London, W1J 5AT
United Kingdom

Registered through: GoDaddy.com, Inc. (<http://www.godaddy.com>)
Domain Name: GRAND-MONACO.COM
Created on: 21-Dec-05
Expires on: 21-Dec-07
Last Updated on: 21-Dec-06

Administrative Contact:
Wright, Max calen.horsman@playshare.com
46 Berkeley Square
London, W1J 5AT
United Kingdom
2075984064

Technical Contact:
Wright, Max calen.horsman@playshare.com
46 Berkeley Square
London, W1J 5AT
United Kingdom
2075984064

Domain servers in listed order:
PARK11.SECURESERVER.NET
PARK12.SECURESERVER.NET

Registry Status: ok

[See Underlying Registry Data](#)
[Report Invalid Whois](#)

Available TLDs

<input type="checkbox"/> GRAND-MONACO.ORG	\$3.99/yr
<input type="checkbox"/> GRAND-MONACO.INFO	\$0.99/yr SAVE!
<input type="checkbox"/> GRAND-MONACO.AZ	\$6.99/yr SAVE!
<input type="checkbox"/> GRAND-MONACO.US	\$7.99/yr
<input type="checkbox"/> GRAND-MONACO.NAME	\$9.99/yr
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<input type="checkbox"/> SITEGRAND-MONACO.ORG	\$8.99/yr
<input type="checkbox"/> GRAND-MONACO.WEB.INFO	\$0.99/yr SAVE!
<input checked="" type="checkbox"/> WEBGRAND-MONACO.INFO	\$0.99/yr SAVE!
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Please note: the registrant of the domain name is specified in the "registrant" field. In most cases, GoDaddy.com, Inc. is not the registrant of domain names listed in this database.

Registrant:
Max Wright
46 Berkeley square
London, w1j 5at
United Kingdom

Registered through: GoDaddy.com, Inc. (<http://www.godaddy.com>)
Domain Name: GRANDMONACO.NET
Created on: 19-Dec-05
Expires on: 19-Dec-07
Last Updated on: 19-Dec-06

Administrative Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley square
London, w1j 5at
United Kingdom
2075984064

Technical Contact:
Wright, Max calan.horsman@playshare.com
46 Berkeley square
London, w1j 5at
United Kingdom
2075984064

Domain servers in listed order:
PARK21.SECURESERVER.NET
PARK22.SECURESERVER.NET

Registry Status: ok
[See Underlying Registry Data](#)
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Available TLDs

- ☐ GRANDMONACO.BIZ \$6.99/yr SAVE!
- ☐ GRANDMONACO.BUS \$7.99/yr
- ☐ GRANDMONACO.NAME \$6.99/yr

You might also consider:

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- ☐ GRANDMONACOHOMENET \$8.99/yr
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WHOIS grandmonaco.org

Voici la réponse intégrale, sans modification, du serveur de l'organisme de gestion de ce nom de domaine. Il n'est pas mis à jour dès l'enregistrement, mais parfois jusqu'à 24h après.

NOTICE: Access to .ORG WHOIS information is provided to assist persons in determining the contents of a Domain name registration record in the Public Interest Registry registry database. The data in this record is provided by Public Interest Registry for informational purposes only, and Public Interest Registry does not guarantee its accuracy. This service is intended only for query-based access. You agree that you will use this data only for lawful purposes and that, under no circumstances will you use this data to: (a) allow, enable, or otherwise support the transmission by e-mail, telephone, or facsimile of mass unsolicited, commercial advertising or solicitations to entities other than the data recipient's own existing customers; or (b) enable high volume, automated, electronic processes that send queries or data to the systems of Registry Operator or any ICANN-Accredited Registrar, except as reasonably necessary to register domain names or modify existing registrations. All rights reserved. Public Interest Registry reserves the right to modify these terms at any time. By submitting this query, you agree to abide by this policy.

Domain ID:D109657498-LROR
 Domain Name:GRANDMONACO.ORG
 Created On:19-Dec-2005 06:51:50 UTC
 Last Updated On:19-Dec-2006 10:02:45 UTC
 Expiration Date:19-Dec-2007 06:51:50 UTC
 Sponsoring Registrar:Go Daddy Software, Inc. (R91-LROR)
 Status:OK

Registrant ID:GODA-025058001
 Registrant Name:Max Wright
 Registrant Street1:46 berkeley square
 Registrant Street2:
 Registrant Street3:
 Registrant City:London
 Registrant State/Province:
 Registrant Postal Code:W1J 5at
 Registrant Country:GB
 Registrant Phone:+44.2075984064
 Registrant Phone Ext.:
 Registrant FAX:
 Registrant FAX Ext.:
 Registrant Email:calan.horsman@playshare.com

Admin ID:GODA-225058001
 Admin Name:Max Wright
 Admin Street1:46 berkeley square
 Admin Street2:
 Admin Street3:
 Admin City:London
 Admin State/Province:
 Admin Postal Code:W1J 5at
 Admin Country:GB
 Admin Phone:+44.2075984064
 Admin Phone Ext.:
 Admin FAX:
 Admin FAX Ext.:
 Admin Email:calan.horsman@playshare.com

Tech ID:GODA-125058001
 Tech Name:Max Wright
 Tech Street1:46 berkeley square
 Tech Street2:
 Tech Street3:
 Tech City:London
 Tech State/Province:
 Tech Postal Code:W1J 5at
 Tech Country:GB
 Tech Phone:+44.2075984064
 Tech Phone Ext.:
 Tech FAX:
 Tech FAX Ext.:
 Tech Email:calan.horsman@playshare.com
 Name Server:PAK21.SECURESERVER.NET
 Name Server:PAK22.SECURESERVER.NET
 Name Server:
 Name Server:
 Name Server:
 Name Server:
 Name Server:

INDOM - Noms de domaine

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Name Server:
Name Server:
Name Server:
Name Server:
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INDOM - Siège social: 44, Rue Notre-Dame des Victoires - 75002 Paris - France (Métro Bourse - Parking Bourse)
Société anonyme au capital de 400 000 € - Siret 428 707 608 000 25
Tél : + 33 (0)1 48 01 83 60 - Fax : + 33 (0)1 48 01 87 73 - E-mail : indom@indom.com